

OFFICE OF CONSUMER ADVOCATE
COMMONWEALTH OF PENNSYLVANIA
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January 23, 2006

Ms. Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S. W.
Washington, DC 20554

In the Matter of:

Federal-State Joint Board on
Universal Service
CC Docket No. 96-45
High-Cost Universal Service Support
WC Docket No. 05-337

Dear Ms. Dortch:

Enclosed for filing please find the National Association of State Utility
Consumer Advocates Response and Support for Extension of Time in the above-
referenced matter.

Please feel free to contact me if you have any questions.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Philip F. McClelland".

Philip F. McClelland
Senior Assistant Consumer Advocate

Enclosure

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of	:	
	:	
Federal-State Joint Board on	:	CC Docket No. 96-45
Universal Service	:	
	:	
High-Cost Universal Service Support	:	WC Docket No. 05-337

**NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER
ADVOCATES
RESPONSE AND SUPPORT FOR EXTENSION OF TIME**

The National Association of State Utility Consumer Advocates¹ (NASUCA) has reviewed the United States Telecom Association request for an extension of time in the above-captioned proceeding. United States Telecom Association has proposed on January 17, 2006 that comments and reply comments in this proceeding should be filed on April 10, 2006 and June 10, 2006, respectively. NASUCA supports this Request for Extension.

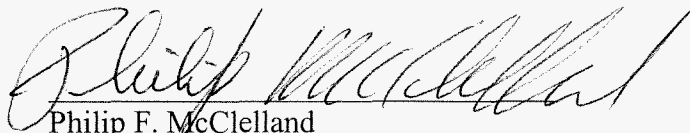
The Notice in this proceeding relates to the decision of the Court of Appeals for the 10th Circuit on February 23, 2005 in *Qwest Corp. v. FCC*, 398 F.3d 1222 (2005) (*Qwest II*) that questioned decisions of the Commission concerning the proper definition and related support mechanisms for universal service. The Commission has requested comment concerning a wide range of issues related to universal service. These include, among others:

¹ NASUCA is a voluntary association of 45 advocate offices in 42 states and the District of Columbia, incorporated in Florida as a non-profit corporation. NASUCA's members are designated by the laws of their respective jurisdictions to represent the interests of utility consumers before state and federal regulators and in the courts. See, e.g., *Ohio. Rev. Code* Ch. 4911; 71 *Pa. Cons. Stat. Ann.* § 309-4(a); *Md. Pub. Util. Code Ann.* § 2-205; *Minn. Stat.* § 8.33; *D.C. Code Ann.* § 34-804(d). Members operate independently from state utility commissions as advocates primarily for residential ratepayers. Some NASUCA member offices are separately established advocate organizations while others are divisions of larger state agencies (e.g., the state Attorney General's office). NASUCA's associate and affiliate members also serve utility consumers, but are not created by state law or do not have statewide authority.

- the seven universal service principles set forth at § 254(b) in defining sufficient for purposes of determining the non-rural high-cost support mechanism,
- conflicts between the seven principles and how they may be resolved and balanced,
- the development of high cost mechanisms to support advanced services in rural areas, and
- the development and analysis of rate data to determine rural and urban variance.

The topics for comment are extremely broad and it will require further time constructively to comment in response. NASUCA hopes to develop data in response to the Notice and comments based upon that data. It would be difficult to develop and analyze such information, and file meaningful comments, in the limited period offered in the Notice. NASUCA supports the United States Telecom Association Request as such request will provide a necessary extension of time so that all parties may address the important issues raised by the FCC's Notice.

Respectfully submitted,



Philip F. McClelland
Senior Assistant Consumer Advocate
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Phone: (717) 783-5048

For: NASUCA
National Association of State Utility
Consumer Advocates
8380 Colesville Road, Suite 101
Silver Spring, MD 20910
Phone: (301) 589-6313

Dated: January 23, 2006
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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of	:	
	:	
Federal-State Joint Board on	:	CC Docket No. 96-45
Universal Service	:	
	:	
High-Cost Universal Service Support	:	WC Docket No. 05-337

I hereby certify that I have this day served a true copy of the foregoing document, National Association of State Utility Consumer Advocates Response and Support for Extension of Time, upon parties of record in this proceeding.

Dated this 23rd day of January, 2006.

Respectfully submitted,



Philip F. McClelland
Senior Assistant Consumer Advocate

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